

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ABHIJIT DAS, MITRA DAS, MUKTI  
L. DAS, and TROCA HOLDINGS  
LLC, for themselves, and as assignees  
of BOSTON EAST TYNGSBORO  
HOLDINGS LLC,

Plaintiffs,

v.

THE LOWELL FIVE CENT SAVINGS  
BANK, DAVID WALLACE,  
JOHN PRATT JR.,  
RICHARD D. REAULT,  
STEVEN J. BRAKE, ESQ, and  
BRIAN K. LEE, ESQ.,

Defendants.

Case 1:24-cv-10931-PBS

**ASSENTED-TO MOTION TO ADMIT  
GREGORY A. MOFFETT TO APPEAR *PRO HAC VICE***

Pursuant to Massachusetts Local Rule 83.5.3(b), Dan Sonneborn, a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, moves for the admission of Attorney Gregory A. Moffett to this Court for the purpose of representing Defendants The Lowell Five Cent Savings Bank, David Wallace, and John Pratt, Jr. in this case *pro hac vice*, and in support hereof states as follows:

1. Gregory A. Moffett is a director with the Law Firm of Preti Flaherty Beliveau & Pachios, LLP. His business address is 57 N. Main Street, Concord, NH 03301. His telephone number is (603) 410-1525.
2. Mr. Moffett is a member in good standing of the Bar of the State of New

Hampshire. He is also admitted to practice before the United States First Circuit Court of Appeals, United States District Court for the District of New Hampshire, the United States District Court for the District of Vermont, the United States Court of Federal Claims, the United States Bankruptcy Court for the District of New Hampshire, and the United States Tax Court. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. *See* Declaration of Gregory A. Moffett, attached hereto as **Exhibit A**.

3. Mr. Moffett is familiar with the applicable provisions of the Local Rules of the United States District Court for the District of Massachusetts.

4. Dan Sonneborn, a member of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, will continue to represent Defendants The Lowell Five Cent Savings Bank, David Wallace, and John Pratt, Jr., if this motion is granted.

**Local Rule 7.1(a)(2) Certification**

The undersigned counsel hereby certifies that he has conferred with all counsel of record counsel in a good faith attempt to resolve or narrow the issue herein. This is an assented-to motion.

WHEREFORE, for the reasons set forth above, Defendants The Lowell Five Cent Savings Bank, David Wallace, and John Pratt, Jr., respectfully request this Honorable Court:

- A. Grant this Motion;
- B. Admit Gregory A. Moffett to practice before this Court *pro hac vice* for the purpose of appearing as counsel for Defendants The Lowell Five Cent Savings Bank, David Wallace, and John Pratt, Jr. in this case in accordance with the Local Rules of this Court; and
- C. Grant such other relief as may be just and proper.

Respectfully submitted,

September 17, 2024

/s/ Daniel R. Sonneborn  
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*Counsel for Defendants The Lowell Five Cent  
Savings Bank, David Wallace, and John Pratt,  
Jr.*

**CERTIFICATE OF SERVICE**

I certify that, on September 17, 2024, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and electronic copies will be sent to those indicated as non-registered participants.

/s/ Daniel R. Sonneborn  
Daniel R. Sonneborn